

Hearing Date: May 17, 2018 at 10:00 a.m. (prevailing Eastern Time)  
Objection Deadline: May 10, 2018 at 12:00 p.m. (prevailing Eastern Time)

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
: :  
: Case No. 16-11700 (SMB)  
Gawker Media LLC, *et al.*,<sup>1</sup> :  
: (Jointly Administered)  
Debtors. :  
: **Docket No. 1105**  
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**NOTICE OF HEARING ON PLAN ADMINISTRATOR'S MOTION FOR ENTRY OF AN  
ORDER PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019  
APPROVING RELEASE AGREEMENT WITH THIEL PARTIES**

PLEASE TAKE NOTICE that on April 25, 2018, William D. Holden as the plan administrator (the "Plan Administrator") for Gawker Media LLC ("Gawker Media"), Gawker Media Group, Inc. ("GMGI"), and Gawker Hungary, Kft. "v.a.", f/k/a Kinja, Kft. ("Gawker Hungary") (collectively, the "Debtors") filed the *Plan Administrator's Motion for Entry of an Order Pursuant Federal Rule of Bankruptcy Procedure 9019 Approving Release Agreement with Thiel Parties* (the "Motion to Approve Release Agreement") [Docket No. 1105]. Contemporaneously, and in connection with the Motion to Approve Release Agreement, the Plan Administrator filed the *Plan Administrator's Motion Pursuant to Federal Rule of Bankruptcy Procedure 9006(c) Shortening Notice Period and Scheduling Hearing with Respect to Plan Administrator's Motion for Entry of an Order Pursuant to Federal Rule of Bankruptcy Procedure 9019 Approving Release Agreement with*

<sup>1</sup> The last four digits of the taxpayer identification numbers of the Debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary, Kft. "v.a." (5056). The offices of the Debtors are located at 10 East 53rd Street, New York, NY 10022.

*Thiel Parties* (the “Motion to Shorten Time”) [Docket No. 1106]. On April 27, 2018, the Court denied the Motion to Shorten Time [Docket No. 1111].

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Motion to Approve Release Agreement will be held before the Honorable Stuart M. Bernstein in the United States Bankruptcy Court for the Southern District of New York, Courtroom 723, One Bowling Green, New York, NY 10004 (the “Court”) on **May 17, 2018, at 10:00 a.m. (prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that responses or objections (the “Objections”), if any, to the Motion to Approve Release Agreement must be made in writing, state with particularity the grounds therefor, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, be filed electronically in text searchable portable document format (PDF) with the Court in accordance with General Order M-399 (General Order M-399 can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Court), by registered users of the Court’s case filing system and by all other parties in interest (with a hard-copy delivered directly to the Judge’s Chambers), and be served in accordance with General Order M-399, and upon (i) the Debtors, Gawker Media Group, Inc., c/o Dacarba LLC, 10 East 53rd Street, New York, NY 10022, Attn: William D. Holden; (ii) counsel to the Plan Administrator for the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Gregg M. Galardi & Kimberly J. Kodis ([gregg.galardi@ropesgray.com](mailto:gregg.galardi@ropesgray.com), [kimberly.kodis@ropesgray.com](mailto:kimberly.kodis@ropesgray.com)); (iii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Greg Zipes & Susan Arbeit; (iv) Harder LLP, 132 S. Rodeo Drive, Fourth Floor, Beverly Hills, CA 90212, Attn: Charles J. Harder ([charder@harderllp.com](mailto:charder@harderllp.com)); (v) counsel to Harder LLP, Norton Rose Fulbright US LLP, 1301 Avenue of the Americas, New York, NY 10019, Attn: Samuel S. Kohn ([samuel.kohn@nortonrosefulbright.com](mailto:samuel.kohn@nortonrosefulbright.com)); (vi) counsel to Peter Thiel and Thiel Capital LLC, Skadden, Arps, Slate, Meagher & Flom, LLP, One Rodney Square, 920 N. King Street, Wilmington, DE 19801, Attn: Anthony W. Clark & Robert A. Weber

(robert.weber@skadden.com, anthony.clark@skadden.com); (vii) counsel to Terry G. Bollea, Cohen & Gresser, LLP, 800 Third Avenue New York, NY 10022, Attn: Daniel H. Tabak & Mark Spatz (dtabak@cohengresser.com, mspatz@cohengresser.com); and (viii) those persons who have formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002, so as to be actually received on or before **12:00 p.m. (prevailing Eastern Time) on May 10, 2018** (the “Objection Deadline”).

**PLEASE TAKE FURTHER NOTICE** that if no Objections are timely filed and served with respect to the Motion to Approve Release Agreement, the Plan Administrator may, on or after the Objection Deadline, submit to the Court an order substantially in the form of the proposed order annexed to the Motion to Approve Release Agreement, which order may be entered with no further notice or opportunity to be heard.

Dated: April 27, 2018  
New York, New York

/s/ Gregg M. Galardi  
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